

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

BASF CORPORATION, as successor in interest to CIBA CORPORATION,	)	CASE NO.: 2:24-cv-993-RMG
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b>FIRST STATE INSURANCE COMPANY,</b>
	)	<b>NEW ENGLAND INSURANCE COMPANY,</b>
	)	<b>AND TWIN CITY FIRE INSURANCE</b>
AIU INSURANCE COMPANY, <i>et al.</i> ,	)	<b>COMPANY’S JOINDERS TO CERTAIN</b>
	)	<b>DEFENDANTS’ MOTIONS TO DISMISS</b>
Defendants.	)	
	)	

---

Defendants, First State Insurance Company, New England Insurance Company and Twin City Fire Insurance Company (“the “Hartford Defendants”) hereby submit their Joinder in the following Motions to Dismiss filed by Certain Defendants:

- The Hartford Defendants join Coliseum Reinsurance Company’s Motion to Dismiss or Transfer (ECF Docket No. 34);
- The Hartford Defendants join Allstate Insurance Company’s Motion to Dismiss and Memorandum of Law in Support of Its Motion to Dismiss (ECF Docket Nos. 37 & 38); and
- The Hartford Defendants join AIU Insurance Company, Granite State Insurance Company, Insurance Company of The State of Pennsylvania, and National Union Fire Insurance Company of Pittsburgh, PA’s Motion to Dismiss and Memorandum of Law in Support of Their Motion to Dismiss the Complaint or, in the Alternative, To Stay This Action (ECF Docket No. 41). In so doing, and with respect to Section C.1., the Hartford Defendants state only that this action presents issues of state law that may be decided by either a New York or New Jersey state court.

*{Signature Page to Follow}*

ETHRIDGE LAW GROUP, LLC

By: *s/ Mary S. Willis*

---

MARY S. WILLIS  
Federal Bar No.: 12388  
R. MICHAEL ETHRIDGE  
Federal Bar No.: 7497  
1100 Queensborough Blvd., Suite 200  
Mount Pleasant, SC 29464  
843-614-0007  
[mwillis@ethridgelawgroup.com](mailto:mwillis@ethridgelawgroup.com)  
[methridge@ethridgelawgroup.com](mailto:methridge@ethridgelawgroup.com)

~ AND ~

WAYNE S. KARBAL (*pro hac vice forthcoming*)  
GERALD E. ZIEBELL (*pro hac vice forthcoming*)  
MARIA DODONA (*pro hac vice forthcoming*)  
Karbal | Cohen | Economou | Silk | Dunne | LLC  
200 S. Wacker Drive, Suite 2550  
Chicago, IL 60606  
312-431-3610  
[wkarbal@KARBALLAW.com](mailto:wkarbal@KARBALLAW.com)  
[gziebell@karballaw.com](mailto:gziebell@karballaw.com)  
[mdodona@karballaw.com](mailto:mdodona@karballaw.com)

*Attorneys for First State Insurance Company,  
New England Insurance Company, and  
Twin City Fire Insurance Company*